

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

SEAN MACMASTER,

Plaintiff,

Case No. 21-cv-11052

Hon. Stephen J. Murphy, III

Magistrate David R. Grand

vs.

DAVID BUSACCA, individually;  
BRIAN KOLODZIEJ, individually;  
MICHAEL GERALD, individually and in his official capacity;  
LAUREN SCHIPANI, individually;  
JOHANNA MACMASTER, individually;  
jointly and severally,

Defendants.

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**ANSWER TO AMENDED COMPLAINT AND DEMAND  
FOR JURY TRIAL BY DEFENDANT BRIAN KOLODZIEJ**

Now comes Defendant, Brian Kolodziej, and for his Answer to Plaintiff's Amended Complaint states as follows:

**JURISDICTION AND VENUE**

1. In response to the allegations contained in paragraph 1 of Plaintiff's complaint, Defendant admits this is a civil action seeking damages but denies all allegations of wrongdoing as untrue.

2. In response to the allegations contained in paragraph 2 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

3. In response to the allegations contained in paragraph 3 of Plaintiff's complaint, Defendant admits the same.

4. In response to the allegations contained in paragraph 4 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

5. In response to the allegations contained in paragraph 5 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

6. In response to the allegations contained in paragraph 6 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

7. In response to the allegations contained in paragraph 7 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

8. In response to the allegations contained in paragraph 8 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

9. In response to the allegations contained in paragraph 9 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves P to his proofs.

10. In response to the allegations contained in paragraph 10 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

11. In response to the allegations contained in paragraph 11 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

12. In response to the allegations contained in paragraph 12 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

13. In response to the allegations contained in paragraph 13 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

14. In response to the allegations contained in paragraph 14 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

15. In response to the allegations contained in paragraph 15 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

16. In response to the allegations contained in paragraph 16 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny

the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

17. In response to the allegations contained in paragraph 17 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

18. In response to the allegations contained in paragraph 18 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

19. In response to the allegations contained in paragraph 19 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

20. In response to the allegations contained in paragraph 20 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

### **COMMON ALLEGATIONS OF FACT**

21. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

22. In response to the allegations contained in paragraph 22 of Plaintiff's complaint, Defendant admits the same, but notes that he was disbarred by consent.

23. In response to the allegations contained in paragraph 23 of Plaintiff's complaint, Defendant admits the same.

24. In response to the allegations contained in paragraph 24 of Plaintiff's complaint, Defendant admits the same.

25. In response to the allegations contained in paragraph 25 of Plaintiff's complaint, Defendant admits the same.

26. In response to the allegations contained in paragraph 26 of Plaintiff's complaint, Defendant admits that he prosecuted sexual assault cases. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

27. In response to the allegations contained in paragraph 27 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

28. In response to the allegations contained in paragraph 28 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

29. In response to the allegations contained in paragraph 29 of Plaintiff's complaint, Defendant denies the same for the reason that they are untrue.

30. In response to the allegations contained in paragraph 30 of Plaintiff's complaint, Defendant denies the same for the reason that they are untrue.

31. In response to the allegations contained in paragraph 31 of Plaintiff's complaint, Defendant denies the same for the reason that they are untrue.

32. In response to the allegations contained in paragraph 32 of Plaintiff's complaint, Defendant admits the same.

33. In response to the allegations contained in paragraph 33 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

34. In response to the allegations contained in paragraph 34 of Plaintiff's complaint, Defendant admits the same.

35. In response to the allegations contained in paragraph 35 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

36. In response to the allegations contained in paragraph 36 of Plaintiff's complaint, Defendant is aware of a custody dispute. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations.

37. In response to the allegations contained in paragraph 37 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

38. In response to the allegations contained in paragraph 38 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

39. In response to the allegations contained in paragraph 39 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

40. In response to the allegations contained in paragraph 40 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

41. In response to the allegations contained in paragraph 41 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the truth or falsity of the accusations and leaves Plaintiff to his proofs. Defendant admits the remaining allegations.

42. In response to the allegations contained in paragraph 42 of Plaintiff's complaint, Defendant admits that Johanna reported to CPS. With regard to the remaining allegations, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs

43. In response to the allegations contained in paragraph 43 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



44. In response to the allegations contained in paragraph 44 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

45. In response to the allegations contained in paragraph 45 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

46. In response to the allegations contained in paragraph 46 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

47. In response to the allegations contained in paragraph 47 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

48. In response to the allegations in paragraph 48 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

49. In response to the allegations contained in paragraph 49 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

50. In response to the allegations contained in paragraph 50 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

51. In response to the allegations contained in paragraph 51 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

52. In response to the allegations contained in paragraph 52 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

53. In response to the allegations contained in paragraph 53 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

54. In response to the allegations contained in paragraph 54 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

55. In response to the allegations contained in paragraph 55 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

56. In response to the allegations contained in paragraph 56 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

57. In response to the allegations contained in paragraph 57 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

58. In response to the allegations contained in paragraph 58 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

59. In response to the allegations contained in paragraph 59 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

60. In response to the allegations contained in paragraph 60 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

61. In response to the allegations contained in paragraph 61 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

62. In response to the allegations contained in paragraph 62 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

63. In response to the allegations contained in paragraph 63 of Plaintiff's complaint, Defendant admits that there was an OCSD investigation. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

64. In response to the allegations contained in paragraph 64 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

65. In response to the allegations contained in paragraph 65 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

66. In response to the allegations contained in paragraph 66 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

67. In response to the allegations contained in paragraph 67 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

68. In response to the allegations contained in paragraph 68 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

69. In response to the allegations contained in paragraph 69 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

70. In response to the allegations contained in paragraph 70 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

71. In response to the allegations contained in paragraph 71 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

72. In response to the allegations contained in paragraph 72 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

73. In response to the allegations contained in paragraph 73 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

74. In response to the allegations contained in paragraph 74 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

75. In response to the allegations contained in paragraph 75 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

76. In response to the allegations contained in paragraph 76 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

77. In response to the allegations contained in paragraph 77 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

78. In response to the allegations contained in paragraph 78 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

79. In response to the allegations contained in paragraph 79 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

80. In response to the allegations contained in paragraph 80 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

81. In response to the allegations in paragraph 81 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

82. In response to the allegations in paragraph 82 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

83. In response to the allegations contained in paragraph 83 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

84. In response to the allegations contained in paragraph 84 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

85. In response to the allegations contained in paragraph 85 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

86. In response to the allegations contained in paragraph 86 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

87. In response to the allegations contained in paragraph 87 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

88. In response to the allegations contained in paragraph 88 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

89. In response to the allegations contained in paragraph 89 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

90. In response to the allegations contained in paragraph 90 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

91. In response to the allegations in paragraph 91 of Plaintiff's complaint, Defendant denies that Johanna reported false accusations. Defendant admits the remainder of Plaintiff's claim.



92. In response to the allegations contained in paragraph 92 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

93. In response to the allegations contained in paragraph 93 of Plaintiff's complaint, Defendant admits the same.

94. In response to the allegations contained in paragraph 94 of Plaintiff's complaint, Defendant denies the same.

95. In response to the allegations contained in paragraph 95 of Plaintiff's complaint, Defendant admits that he met with Johanna. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

96. In response to the allegations contained in paragraph 96 of Plaintiff's complaint, Defendant denies the same.

97. In response to the allegations contained in paragraph 97 of Plaintiff's complaint, Defendant admits that he was an assistant prosecutor for Macomb County in April 2018. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

98. In response to the allegations in paragraph 98 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

99. In response to the allegations contained in paragraph 99 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

100. In response to the allegations contained in paragraph 100 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

101. In response to the allegations contained in paragraph 101 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

102. In response to the allegations contained in paragraph 102 of Plaintiff's complaint, Defendant denies the same.

103. In response to the allegations contained in paragraph 103 of Plaintiff's complaint, Defendant denies the same.

104. In response to the allegations contained in paragraph 104 of Plaintiff's complaint, Defendant admits the same.

105. In response to the allegations contained in paragraph 105 of Plaintiff's complaint, Defendant admits the same.

106. In response to the allegations contained in paragraph 106 of Plaintiff's complaint, Defendant admits the same.

107. In response to the allegations contained in paragraph 107 of Plaintiff's complaint, Defendant denies that Johanna was the party making accusations. Defendant admits that he contacted Gerald regarding AM's accusations. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

108. In response to the allegations contained in paragraph 108 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

109. In response to the allegations contained in paragraph 109 of Plaintiff's complaint, Defendant admits an understanding that Gerald was employed by the Center Line Police Department and that Gerald was sworn in on the FBI Task Force for Human Trafficking and Child Sexual Assault.

110. In response to the allegations contained in paragraph 110 of Plaintiff's complaint, Defendant admits the same.

111. In response to the allegations contained in paragraph 111 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

112. In response to the allegations contained in paragraph 112 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

113. In response to the allegations contained in paragraph 113 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

114. In response to the allegations contained in paragraph 114 of Plaintiff's complaint, Defendant admits that he arranged a meeting between Johanna and Gerald. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

115. In response to the allegations contained in paragraph 115 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

116. In response to the allegations contained in paragraph 116 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

117. In response to the allegations contained in paragraph 117 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

118. In response to the allegations contained in paragraph 118 of Plaintiff's complaint, Defendant admits the same.

119. In response to the allegations contained in paragraph 119 of Plaintiff's complaint, Defendant denies the same.

120. In response to the allegations contained in paragraph 120 of Plaintiff's complaint, Defendant admits that he met with Assistant Attorney General Kelly Carter. Defendant denies that Johanna was the party making accusations. Defendant lacks sufficient knowledge or information to admit or deny the remaining allegations and leaves Plaintiff to his proofs.

121. In response to the allegations contained in paragraph 121 of Plaintiff's complaint, Defendant admits the same.

122. In response to the allegations contained in paragraph 122 of Plaintiff's complaint, Defendant denies the same.

123. In response to the allegations contained in paragraph 123 of Plaintiff's complaint, Defendant admits the same.

124. In response to the allegations contained in paragraph 124 of Plaintiff's complaint, Defendant admits the same.

125. In response to the allegations contained in paragraph 125 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

126. In response to the allegations contained in paragraph 126 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

127. In response to the allegations contained in paragraph 127 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

128. In response to the allegations contained in paragraph 128 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

129. In response to the allegations contained in paragraph 129 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

130. In response to the allegations contained in paragraph 130 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

131. In response to the allegations contained in paragraph 131 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

132. In response to the allegations contained in paragraph 132 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

133. In response to the allegations contained in paragraph 133 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

134. In response to the allegations contained in paragraph 134 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

135. In response to the allegations contained in paragraph 135 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

136. In response to the allegations contained in paragraph 136 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

137. In response to the allegations contained in paragraph 137 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

138. In response to the allegations contained in paragraph 138 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

139. In response to the allegations contained in paragraph 139 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

140. In response to the allegations contained in paragraph 140 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

141. In response to the allegations contained in paragraph 141 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

142. In response to the allegations contained in paragraph 142 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



143. In response to the allegations contained in paragraph 143 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

144. In response to the allegations contained in paragraph 144 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

145. In response to the allegations contained in paragraph 145 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

146. In response to the allegations contained in paragraph 146 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

147. In response to the allegations contained in paragraph 147 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

148. In response to the allegations contained in paragraph 148 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

149. In response to the allegations contained in paragraph 149 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

150. In response to the allegations contained in paragraph 150 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

151. In response to the allegations contained in paragraph 151 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

152. In response to the allegations contained in paragraph 152 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

153. In response to the allegations contained in paragraph 153 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

154. In response to the allegations contained in paragraph 154 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

155. In response to the allegations contained in paragraph 155 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

156. In response to the allegations contained in paragraph 156 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

157. In response to the allegations contained in paragraph 157 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

158. In response to the allegations contained in paragraph 158 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

159. In response to the allegations contained in paragraph 159 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

160. In response to the allegations contained in paragraph 160 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

161. In response to the allegations contained in paragraph 161 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

162. In response to the allegations contained in paragraph 162 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

163. In response to the allegations contained in paragraph 163 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

164. In response to the allegations contained in paragraph 164 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

165. In response to the allegations contained in paragraph 165 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

166. In response to the allegations contained in paragraph 166 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

167. In response to the allegations contained in paragraph 167 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

168. In response to the allegations contained in paragraph 168 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

169. In response to the allegations contained in paragraph 169 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

170. In response to the allegations contained in paragraph 170 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

171. In response to the allegations contained in paragraph 171 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

172. In response to the allegations contained in paragraph 172 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

173. In response to the allegations contained in paragraph 173 of Plaintiff's complaint, Defendant admits the same.

174. In response to the allegations contained in paragraph 174 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

175. In response to the allegations contained in paragraph 175 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

176. In response to the allegations contained in paragraph 176 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

177. In response to the allegations contained in paragraph 177 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

178. In response to the allegations contained in paragraph 178 of Plaintiff's complaint, Defendant admits the same.

179. In response to the allegations contained in paragraph 179 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

180. In response to the allegations contained in paragraph 180 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

181. In response to the allegations contained in paragraph 181 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

182. In response to the allegations contained in paragraph 182 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

183. In response to the allegations contained in paragraph 183 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

184. In response to the allegations contained in paragraph 184 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

185. In response to the allegations contained in paragraph 185 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

186. In response to the allegations contained in paragraph 186 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

187. In response to the allegations contained in paragraph 187 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

188. In response to the allegations contained in paragraph 188 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

189. In response to the allegations contained in paragraph 189 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

190. In response to the allegations contained in paragraph 190 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

191. In response to the allegations contained in paragraph 191 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



192. In response to the allegations contained in paragraph 192 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

193. In response to the allegations contained in paragraph 193 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

194. In response to the allegations contained in paragraph 194 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

195. In response to the allegations contained in paragraph 195 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

196. In response to the allegations contained in paragraph 196 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

197. In response to the allegations contained in paragraph 197 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

198. In response to the allegations contained in paragraph 198 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

199. In response to the allegations contained in paragraph 199 of Plaintiff's complaint, Defendant admits the same.

200. In response to the allegations contained in paragraph 200 of Plaintiff's complaint, Defendant admits the same.

201. In response to the allegations contained in paragraph 201 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

202. In response to the allegations contained in paragraph 202 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

203. In response to the allegations contained in paragraph 203 of Plaintiff's complaint, Defendant admits the same.

204. In response to the allegations contained in paragraph 204 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

205. In response to the allegations contained in paragraph 205 of Plaintiff's complaint, Defendant denies the same.

206. In response to the allegations contained in paragraph 206 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

207. In response to the allegations contained in paragraph 207 of Plaintiff's complaint, Defendant denies the same.

208. In response to the allegations contained in paragraph 208 of Plaintiff's complaint, Defendant denies the same.

209. In response to the allegations contained in paragraph 209 of Plaintiff's complaint, Defendant admits the same.

210. In response to the allegations contained in paragraph 210 of Plaintiff's complaint, Defendant denies the same.

211. In response to the allegations contained in paragraph 211 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

212. In response to the allegations contained in paragraph 212 of Plaintiff's complaint, Defendant denies the same.

213. In response to the allegations contained in paragraph 213 of Plaintiff's complaint, Defendant denies the same.

214. In response to the allegations contained in paragraph 214 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny

the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

215. In response to the allegations contained in paragraph 215 of Plaintiff's complaint, Defendant denies the same.

216. In response to the allegations contained in paragraph 216 of Plaintiff's complaint, Defendant denies the same.

217. In response to the allegations contained in paragraph 217 of Plaintiff's complaint, Defendant denies the same.

218. In response to the allegations contained in paragraph 218 of Plaintiff's complaint, Defendant denies the same.

219. In response to the allegations contained in paragraph 219 of Plaintiff's complaint, Defendant denies the same.

220. In response to the allegations contained in paragraph 220 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

221. In response to the allegations contained in paragraph 221 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

222. In response to the allegations contained in paragraph 222 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

223. In response to the allegations contained in paragraph 223 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

224. In response to the allegations contained in paragraph 224 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

225. In response to the allegations contained in paragraph 225 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

226. In response to the allegations contained in paragraph 226 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

227. In response to the allegations contained in paragraph 227 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

228. In response to the allegations contained in paragraph 228 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

229. In response to the allegations contained in paragraph 229 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

230. In response to the allegations contained in paragraph 230 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

231. In response to the allegations contained in paragraph 231 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

232. In response to the allegations contained in paragraph 232 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

233. In response to the allegations contained in paragraph 233 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

234. In response to the allegations contained in paragraph 234 of Plaintiff's complaint, Defendant admits the same.

235. In response to the allegations contained in paragraph 235 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

236. In response to the allegations contained in paragraph 236 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

237. In response to the allegations contained in paragraph 237 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

238. In response to the allegations contained in paragraph 238 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

239. In response to the allegations contained in paragraph 239 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

240. In response to the allegations contained in paragraph 240 of Plaintiff's complaint, Defendant denies the same.

241. In response to the allegations contained in paragraph 241 of Plaintiff's complaint, Defendant denies the same.

242. In response to the allegations contained in paragraph 242 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

243. In response to the allegations contained in paragraph 243 of Plaintiff's complaint, Defendant denies the same.

244. In response to the allegations contained in paragraph 244 of Plaintiff's complaint, Defendant denies the same.

245. In response to the allegations contained in paragraph 245 of Plaintiff's complaint, Defendant denies the same.

246. In response to the allegations contained in paragraph 246 of Plaintiff's complaint, Defendant denies the same.

247. In response to the allegations contained in paragraph 247 of Plaintiff's complaint, Defendant denies the same.

248. In response to the allegations contained in paragraph 248 of Plaintiff's complaint, Defendant denies the same.

249. In response to the allegations contained in paragraph 249 of Plaintiff's complaint, Defendant denies the same.



250. In response to the allegations contained in paragraph 250 of Plaintiff's complaint, Defendant denies the same.

251. In response to the allegations contained in paragraph 251 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

252. In response to the allegations contained in paragraph 252 of Plaintiff's complaint, Defendant denies the same.

253. In response to the allegations contained in paragraph 253 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

254. In response to the allegations contained in paragraph 254 of Plaintiff's complaint, Defendant admits the same.

255. In response to the allegations contained in paragraph 255 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

256. In response to the allegations contained in paragraph 256 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

257. In response to the allegations contained in paragraph 257 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

258. In response to the allegations contained in paragraph 258 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

259. In response to the allegations contained in paragraph 259 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

260. In response to the allegations contained in paragraph 260 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

261. In response to the allegations contained in paragraph 261 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

262. In response to the allegations contained in paragraph 262 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

263. In response to the allegations contained in paragraph 263 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

264. In response to the allegations contained in paragraph 264 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

265. In response to the allegations contained in paragraph 265 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

266. In response to the allegations contained in paragraph 266 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

267. In response to the allegations contained in paragraph 267 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

268. In response to the allegations contained in paragraph 268 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

269. In response to the allegations contained in paragraph 269 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

270. In response to the allegations contained in paragraph 270 of Plaintiff's complaint, Defendant admits the same.

271. In response to the allegations contained in paragraph 271 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

272. In response to the allegations contained in paragraph 272 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

273. In response to the allegations contained in paragraph 273 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

274. In response to the allegations contained in paragraph 274 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

275. In response to the allegations contained in paragraph 275 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

276. In response to the allegations contained in paragraph 276 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

277. In response to the allegations contained in paragraph 277 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

278. In response to the allegations contained in paragraph 278 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

279. In response to the allegations contained in paragraph 279 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

280. In response to the allegations contained in paragraph 280 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

281. In response to the allegations contained in paragraph 281 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

282. In response to the allegations contained in paragraph 282 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

283. In response to the allegations contained in paragraph 281 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

284. In response to the allegations contained in paragraph 284 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

285. In response to the allegations contained in paragraph 285 of Plaintiff's complaint, Defendant denies the same.

286. In response to the allegations contained in paragraph 286 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

287. In response to the allegations contained in paragraph 287 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

288. In response to the allegations contained in paragraph 288 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

289. In response to the allegations contained in paragraph 289 of Plaintiff's complaint, Defendant denies the same.

290. In response to the allegations contained in paragraph 290 of Plaintiff's complaint, Defendant denies the same.

291. In response to the allegations contained in paragraph 291 of Plaintiff's complaint, Defendant denies the same.

292. In response to the allegations contained in paragraph 292 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

293. In response to the allegations contained in paragraph 293 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

294. In response to the allegations contained in paragraph 294 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

295. In response to the allegations contained in paragraph 295 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

296. In response to the allegations contained in paragraph 296 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

297. In response to the allegations contained in paragraph 297 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

298. In response to the allegations contained in paragraph 298 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

299. In response to the allegations contained in paragraph 299 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

300. In response to the allegations contained in paragraph 300 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



301. In response to the allegations contained in paragraph 301 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

302. In response to the allegations contained in paragraph 302 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

303. In response to the allegations contained in paragraph 303 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

304. In response to the allegations contained in paragraph 304 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

305. In response to the allegations contained in paragraph 305 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

306. In response to the allegations contained in paragraph 306 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

307. In response to the allegations contained in paragraph 307 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

308. In response to the allegations contained in paragraph 308 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

309. In response to the allegations contained in paragraph 309 of Plaintiff's complaint, Defendant denies the same.

310. In response to the allegations contained in paragraph 310 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

311. In response to the allegations contained in paragraph 311 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

312. In response to the allegations contained in paragraph 312 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

313. In response to the allegations contained in paragraph 313 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

314. In response to the allegations contained in paragraph 314 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

315. In response to the allegations contained in paragraph 315 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

316. In response to the allegations contained in paragraph 316 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

317. In response to the allegations contained in paragraph 317 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

318. In response to the allegations contained in paragraph 318 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

319. In response to the allegations contained in paragraph 319 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

320. In response to the allegations contained in paragraph 320 of Plaintiff's complaint, Defendant denies the same.

321. In response to the allegations contained in paragraph 321 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

322. In response to the allegations contained in paragraph 322 of Plaintiff's complaint, Defendant denies the same.

323. In response to the allegations contained in paragraph 323 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

324. In response to the allegations contained in paragraph 324 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

325. In response to the allegations contained in paragraph 325 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

326. In response to the allegations contained in paragraph 326 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

327. In response to the allegations contained in paragraph 327 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

328. In response to the allegations contained in paragraph 328 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

329. In response to the allegations contained in paragraph 329 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

330. In response to the allegations contained in paragraph 330 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

331. In response to the allegations contained in paragraph 331 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

332. In response to the allegations contained in paragraph 332 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

333. In response to the allegations contained in paragraph 333 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

334. In response to the allegations contained in paragraph 334 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

335. In response to the allegations contained in paragraph 335 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

336. In response to the allegations contained in paragraph 336 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

337. In response to the allegations contained in paragraph 337 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

338. In response to the allegations contained in paragraph 338 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

339. In response to the allegations contained in paragraph 339 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

340. In response to the allegations contained in paragraph 340 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

341. In response to the allegations contained in paragraph 341 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

342. In response to the allegations contained in paragraph 342 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

343. In response to the allegations contained in paragraph 343 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

344. In response to the allegations contained in paragraph 344 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

345. In response to the allegations contained in paragraph 345 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

346. In response to the allegations contained in paragraph 346 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

347. In response to the allegations contained in paragraph 347 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

348. In response to the allegations contained in paragraph 348 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

349. In response to the allegations contained in paragraph 349 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

350. In response to the allegations contained in paragraph 350 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

351. In response to the allegations contained in paragraph 351 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



352. In response to the allegations contained in paragraph 352 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

353. In response to the allegations contained in paragraph 353 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

354. In response to the allegations contained in paragraph 354 of Plaintiff's complaint, Defendant denies the same.

355. In response to the allegations contained in paragraph 355 of Plaintiff's complaint, Defendant denies the same.

356. In response to the allegations contained in paragraph 356 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

357. In response to the allegations contained in paragraph 357 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

358. In response to the allegations contained in paragraph 358 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

359. In response to the allegations contained in paragraph 359 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

360. In response to the allegations contained in paragraph 360 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

361. In response to the allegations contained in paragraph 361 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

362. In response to the allegations contained in paragraph 362 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

363. In response to the allegations contained in paragraph 363 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

364. In response to the allegations contained in paragraph 364 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

365. In response to the allegations contained in paragraph 365 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

366. In response to the allegations contained in paragraph 366 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

367. In response to the allegations contained in paragraph 367 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

368. In response to the allegations contained in paragraph 368 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

369. In response to the allegations contained in paragraph 369 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

370. In response to the allegations contained in paragraph 370 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

371. In response to the allegations contained in paragraph 371 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

372. In response to the allegations contained in paragraph 372 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

373. In response to the allegations contained in paragraph 373 of Plaintiff's complaint, Defendant denies the same.

374. In response to the allegations contained in paragraph 374 of Plaintiff's complaint, Defendant denies the same.

375. In response to the allegations contained in paragraph 375 of Plaintiff's complaint, Defendant denies the same.

376. In response to the allegations contained in paragraph 376 of Plaintiff's complaint, Defendant denies the same.

377. In response to the allegations contained in paragraph 377 of Plaintiff's complaint, Defendant denies the same.

378. In response to the allegations contained in paragraph 378 of Plaintiff's complaint, Defendant denies the same.

379. In response to the allegations contained in paragraph 379 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

380. In response to the allegations contained in paragraph 380 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

381. In response to the allegations contained in paragraph 381 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

382. In response to the allegations contained in paragraph 382 of Plaintiff's complaint, Defendant denies the same.

383. In response to the allegations contained in paragraph 383 of Plaintiff's complaint, Defendant denies the same.

384. In response to the allegations contained in paragraph 384 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

385. In response to the allegations contained in paragraph 385 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

386. In response to the allegations contained in paragraph 386 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

387. In response to the allegations contained in paragraph 387 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

388. In response to the allegations contained in paragraph 388 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

389. In response to the allegations contained in paragraph 389 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

390. In response to the allegations contained in paragraph 390 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

391. In response to the allegations contained in paragraph 391 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

392. In response to the allegations contained in paragraph 392 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

393. In response to the allegations contained in paragraph 393 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

394. In response to the allegations contained in paragraph 394 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

395. In response to the allegations contained in paragraph 395 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

396. In response to the allegations contained in paragraph 396 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

397. In response to the allegations contained in paragraph 397 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs. Defendant denies any wrongdoing.

398. In response to the allegations contained in paragraph 398 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

399. In response to the allegations contained in paragraph 399 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

400. In response to the allegations contained in paragraph 400 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

401. In response to the allegations contained in paragraph 401 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

402. In response to the allegations contained in paragraph 402 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

403. In response to the allegations contained in paragraph 403 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.



404. In response to the allegations contained in paragraph 404 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

405. In response to the allegations contained in paragraph 405 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

406. In response to the allegations contained in paragraph 406 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. Defendant denies all allegations of wrongdoing as untrue.

407. In response to the allegations contained in paragraph 407 of Plaintiff's complaint, Defendant denies the same.

408. In response to the allegations contained in paragraph 408 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

409. In response to the allegations contained in paragraph 409 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

410. In response to the allegations contained in paragraph 410 of Plaintiff's complaint, Defendant denies the same.

411. In response to the allegations contained in paragraph 411 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

412. In response to the allegations contained in paragraph 412 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

413. In response to the allegations contained in paragraph 413 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

414. In response to the allegations contained in paragraph 414 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

415. In response to the allegations contained in paragraph 415 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

416. In response to the allegations contained in paragraph 416 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

417. In response to the allegations contained in paragraph 417 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs. Defendant denies any wrongdoing.

418. In response to the allegations contained in paragraph 418 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

419. In response to the allegations contained in paragraph 419 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

420. In response to the allegations contained in paragraph 420 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

421. In response to the allegations contained in paragraph 421 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs. Defendant denies any wrongdoing.

422. In response to the allegations contained in paragraph 422 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

423. In response to the allegations contained in paragraph 423 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

424. In response to the allegations contained in paragraph 424 of Plaintiff's complaint, Defendant denies the same.

425. In response to the allegations contained in paragraph 425 of Plaintiff's complaint, Defendant admits the same.

426. In response to the allegations contained in paragraph 426 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

427. In response to the allegations contained in paragraph 427 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

428. In response to the allegations contained in paragraph 428 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

429. In response to the allegations contained in paragraph 429 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

430. In response to the allegations contained in paragraph 430 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

431. In response to the allegations contained in paragraph 431 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

432. In response to the allegations contained in paragraph 432 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

433. In response to the allegations contained in paragraph 433 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

434. In response to the allegations contained in paragraph 434 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

435. In response to the allegations contained in paragraph 435 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

436. In response to the allegations contained in paragraph 436 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

437. In response to the allegations contained in paragraph 437 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

438. In response to the allegations contained in paragraph 438 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

439. In response to the allegations contained in paragraph 439 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

440. In response to the allegations contained in paragraph 440 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

### **COUNT I**

441. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

442. In response to the allegations contained in paragraph 442 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

443. In response to the allegations contained in paragraph 443 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

444. In response to the allegations contained in paragraph 444 of Plaintiff's complaint, Defendant denies the same.

445. In response to the allegations contained in paragraph 445 of Plaintiff's complaint, Defendant denies the same.

446. In response to the allegations contained in paragraph 446 of Plaintiff's complaint, Defendant denies the same.

447. In response to the allegations contained in paragraph 447 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

448. In response to the allegations contained in paragraph 448 of Plaintiff's complaint, Defendant denies the same.

449. In response to the allegations contained in paragraph 449 of Plaintiff's complaint, Defendant denies the same.

450. In response to the allegations contained in paragraph 450 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

451. In response to the allegations contained in paragraph 451 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

452. In response to the allegations contained in paragraph 452 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

453. In response to the allegations contained in paragraph 453 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

## **COUNT II**

454. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

455. In response to the allegations contained in paragraph 455 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny



the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

456. In response to the allegations contained in paragraph 456 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

457. In response to the allegations contained in paragraph 457 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

458. In response to the allegations contained in paragraph 458 of Plaintiff's complaint, Defendant denies the same.

459. In response to the allegations contained in paragraph 459 of Plaintiff's complaint, Defendant admits the same.

460. In response to the allegations contained in paragraph 460 of Plaintiff's complaint, Defendant denies the same.

461. In response to the allegations contained in paragraph 461 of Plaintiff's complaint, Defendant admits the same.

462. In response to the allegations contained in paragraph 462 of Plaintiff's complaint, Defendant denies the same.

463. In response to the allegations contained in paragraph 463 of Plaintiff's complaint, Defendant denies the same.

464. In response to the allegations contained in paragraph 464 of Plaintiff's complaint, Defendant admits the same.

465. In response to the allegations contained in paragraph 465 of Plaintiff's complaint, Defendant denies the same.

466. In response to the allegations contained in paragraph 466 of Plaintiff's complaint, Defendant denies the same.

467. In response to the allegations contained in paragraph 467 of Plaintiff's complaint, Defendant denies the same.

468. In response to the allegations contained in paragraph 468 of Plaintiff's complaint, Defendant denies the same.

469. In response to the allegations contained in paragraph 469 of Plaintiff's complaint, Defendant denies the same.

470. In response to the allegations contained in paragraph 470 of Plaintiff's complaint, Defendant denies the same.

471. In response to the allegations contained in paragraph 471 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny

the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

472. In response to the allegations contained in paragraph 472 of Plaintiff's complaint, Defendant denies the same.

473. In response to the allegations contained in paragraph 473 of Plaintiff's complaint, Defendant denies the same.

474. In response to the allegations contained in paragraph 474 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

475. In response to the allegations contained in paragraph 475 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same as untrue.

476. In response to the allegations contained in paragraph 476 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his

proofs. To the extent that a response is required, Defendant denies the same as untrue.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

### **COUNT III**

477. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

478. In response to the allegations contained in paragraph 478 of Plaintiff's complaint, Defendant denies the same.

479. In response to the allegations contained in paragraph 479 of Plaintiff's complaint, Defendant denies the same.

480. In response to the allegations contained in paragraph 480 of Plaintiff's complaint, Defendant admits that the charges were dismissed. Defendant denies the remaining allegations.

481. In response to the allegations contained in paragraph 481 of Plaintiff's complaint, Defendant denies the same.

482. In response to the allegations contained in paragraph 482 of Plaintiff's complaint, Defendant denies the same.

483. In response to the allegations contained in paragraph 483 of Plaintiff's complaint, Defendant denies the same.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

#### **COUNT IV**

484. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

485. In response to the allegations contained in paragraph 485 of Plaintiff's complaint, Defendant denies the same.

486. In response to the allegations contained in paragraph 486 of Plaintiff's complaint, Defendant denies the same.

487. In response to the allegations contained in paragraph 487 of Plaintiff's complaint, Defendant denies the same.

488. In response to the allegations contained in paragraph 488 of Plaintiff's complaint, Defendant denies the same.

489. In response to the allegations contained in paragraph 489 of Plaintiff's complaint, Defendant denies the same.

490. In response to the allegations contained in paragraph 490 of Plaintiff's complaint, Defendant denies the same.

491. In response to the allegations contained in paragraph 491 of Plaintiff's complaint, Defendant denies the same.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

### **COUNT V**

492. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

493. In response to the allegations contained in paragraph 493 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

494. In response to the allegations contained in paragraph 494 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

495. In response to the allegations contained in paragraph 495 of Plaintiff's complaint, Defendant denies the same.

496. In response to the allegations contained in paragraph 496 of Plaintiff's complaint, Defendant denies the same.

497. In response to the allegations contained in paragraph 497 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

498. In response to the allegations contained in paragraph 498 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

499. In response to the allegations contained in paragraph 499 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

500. In response to the allegations contained in paragraph 500 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

501. In response to the allegations contained in paragraph 501 of Plaintiff's complaint, Defendant denies the same.

502. In response to the allegations contained in paragraph 502 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs.

503. In response to the allegations contained in paragraph 503 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny

the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same.

504. In response to the allegations contained in paragraph 504 of Plaintiff's complaint, Defendant denies the same.

505. In response to the allegations contained in paragraph 505 of Plaintiff's complaint, Defendant denies the same.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

#### **COUNT VI**

506. Defendant incorporates by reference and restates herein the responses contained in the foregoing paragraphs.

507. In response to the allegations contained in paragraph 507 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

508. In response to the allegations contained in paragraph 508 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same for the reason that they state legal conclusions and leaves Plaintiff to his proofs. To the extent that a response is required, Defendant denies the same.



509. In response to the allegations contained in paragraph 509 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

510. In response to the allegations contained in paragraph 510 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

511. In response to the allegations contained in paragraph 511 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

512. In response to the allegations contained in paragraph 512 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

513. In response to the allegations contained in paragraph 513 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

514. In response to the allegations contained in paragraph 514 of Plaintiff's complaint, Defendant lacks sufficient knowledge or information to admit or deny the same and leaves Plaintiff to his proofs.

WHEREFORE, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint in its entirety, with prejudice, and award Defendant his costs and fees so wrongfully sustained.

Respectfully submitted,  
By: /s/Brian J. Kolodziej  
46471 Jonathan Circle, Apt. 209  
Shelby Township, MI 48317  
(586) 872-0025  
Bklaw2020@yahoo.com  
*Pro Se* Defendant

Dated: January 28, 2022

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

SEAN MACMASTER,

Plaintiff,

Case No. 21-cv-11052

Hon. Stephen J. Murphy, III

Magistrate David R. Grand

vs.

DAVID BUSACCA, individually;  
BRIAN KOLODZIEJ, individually;  
MICHAEL GERALD, individually and in his official capacity;  
LAUREN SCHIPANI, individually;  
JOHANNA MACMASTER, individually;  
jointly and severally,

Defendants.

---

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**AFFIRMATIVE DEFENSES**

Now comes Defendant, Brian Kolodziej, and for his affirmative defenses states as follows:

1. Plaintiff's Complaint fails to state a claim on which relief can be granted.
2. Plaintiff's claims are barred, in whole or in part, by the doctrines of absolute and/or qualified immunity.
3. Plaintiff's claims are barred, in whole or in part, for failure to join a necessary or indispensable party.
4. Plaintiff's claims are barred, in whole or in part, by Michigan statutory and/or common law governmental immunity.
5. Plaintiff's claims, in whole or in part, are barred by the applicable limitations periods and/or laches.
6. Plaintiff's claims are barred, in whole or in part, by the failure to exhaust administrative and/or statutory remedies.

7. Plaintiff's claims are barred, in whole or in part, because he has suffered no damages and/or has failed to mitigate his damages, entitlement to which, is expressly denied.

8. Plaintiff's claims are barred, in whole or in part, by estoppel.

9. Plaintiff's claims are barred, in whole or in part, by waiver.

10. Plaintiff's claims are barred, in whole or in part, by the doctrine of unclean hands.

11. Plaintiff's claims are barred, in whole or in part, by res judicata and/or collateral estoppel.

12. Plaintiff's claims may be barred due to spoliation for his failure to maintain or preserve evidence.

13. Defendant may not have been acting under color of state law.

14. The proximate cause of any injury or damages to Plaintiff, if any, was not the action of Defendant.

15. At all times, Defendant reasonably believed his actions were consistent with his obligations under state and federal law.

16. Defendant's actions or inactions, at all times in regard to Plaintiff, were not taken with malice or reckless indifference to Plaintiff's rights.

17. Defendant acted in good faith at all times.

18. Defendant cannot be held individually liable for Plaintiff's claims.

19. Jurisdictional violations, if any, are insufficient basis for a finding of constitutional deprivation.

20. Plaintiff's claim for conspiracy is based solely on conclusory and vague allegations and, therefore, must be dismissed.

21. Plaintiff has failed to make any allegation, nor is there any evidence to support, conspiratorial objective or plan.

22. Defendant Kolodziej did not make the decision to prosecute plaintiff.

23. The existence of probable cause to initiate criminal prosecution is a bar to Plaintiff's claims.

24. The dismissal of the charges in this case was not indicative of innocence, nor that a conviction was improbable and, therefore, does not equate to a resolution in Plaintiff's favor, thus barring his malicious prosecution claim.

25. Plaintiff is liable for comparative fault.

26. All of Plaintiff's alleged damages/injuries were the result of the conduct of persons other than Defendant, thereby barring any recovery from Defendant.

27. Plaintiff's alleged damages/injuries, if any, were solely or proximately caused by an intervening or superseding cause, and Plaintiff's recovery against Defendant is therefore barred.

28. Defendant hereby adopts and incorporates by reference any current or future Affirmative Defenses of co-defendants or third-party defendants.

29. Defendant reserves the right to amend these affirmative defenses and/or add additional affirmative defenses upon obtaining additional information or evidence.

**WHEREFORE**, Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Complaint with prejudice and award Defendant his costs and fees so wrongfully sustained.

Respectfully submitted,

By: /s/Brian J. Kolodziej  
46471 Jonathan Circle, Apt. 209  
Shelby Township, MI 48317  
(586) 872-0025  
Bklaw2020@yahoo.com  
*Pro Se* Defendant

Dated: January 28, 2022

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

SEAN MACMASTER,

Plaintiff,

Case No. 21-cv-11052

Hon. Stephen J. Murphy, III

Magistrate David R. Grand

vs.

DAVID BUSACCA, individually;  
BRIAN KOLODZIEJ, individually;  
MICHAEL GERALD, individually and in his official capacity;  
LAUREN SCHIPANI, individually;  
JOHANNA MACMASTER, individually;  
jointly and severally,

Defendants.

---

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---

**RELIANCE ON JURY DEMAND**

NOW COMES Defendant, Brian Kolodziej, and hereby relies upon the Jury  
Demand filed by Plaintiff.

Respectfully submitted,

By: /s/Brian J. Kolodziej  
46471 Jonathan Circle, Apt. 209  
Shelby Township, MI 48317  
(586) 872-0025  
Bklaw2020@yahoo.com  
*Pro Se* Defendant

Dated: January 28, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on January 28, 2022, I electronically filed the foregoing document with the Clerk of the Court using the ECF system which will send notification of such filing to all filing users indicated on the Electronic Notice List through the Courts electronic filing system.

Respectfully submitted,

By: /s/Brian J. Kolodziej  
46471 Jonathan Circle, Apt. 209  
Shelby Township, MI 48317  
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Bklaw2020@yahoo.com  
*Pro Se* Defendant

Dated: January 28, 2022